

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,

NOTICE OF MOTION

- against -

ECF Case

JOSEPH M. DUPONT,
SHAWN P. CRONIN,
STANLEY KAPLAN,
PAUL FELDMAN, and
JARETT G. MENDOZA,

No. 23 Civ. 5565 (VM)

Defendants.

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PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in the criminal case *United States v. Joseph Dupont, Shawn Cronin, Slava (Stanley) Kaplan, and Paul Feldman*, No. 23 Cr. 320 (GHW) (the “Criminal Case”); and the accompanying memorandum of law, the United States of America, by its attorney, Damian Williams, United States Attorney for the Southern District of New York, and Margaret Graham, Sarah Mortazavi, and Samuel P. Rothschild, Assistant United States Attorneys, will move this Court for an order (1) to intervene in the above-captioned case (the “Civil Case”), pursuant to Rule 24 of the Federal Rules of Civil Procedure, and (2) for a full stay of the Civil Case, including a stay of all discovery, until the conclusion of the Criminal Case, as well as for such other relief as the Court deems just

and proper.

Dated: New York, New York
August 11, 2023

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 
Margaret Graham
Sarah Mortazavi
Samuel P. Rothschild
Assistant United States Attorneys
One Saint Andrew's Plaza
New York, New York 10007
Telephone: (212) 637-2923 / 2520 / 2504